

# Sponsor Oversight Responsibilities

## Sponsors of Unaffiliated Centers

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# Workbook Overview

- ▶ Good news!! No significant changes!
- ▶ Mainly formatting and wording clarifications.
  - ▶ Refer to attached memo for specific changes.
- ▶ Reminders:
  - ▶ Revised forms should be implemented no later than October 1, 2015.
  - ▶ Changes to forms must be submitted to DOH for approval prior to implementation.

## **Sponsor Oversight Responsibilities for Sponsors of Unaffiliated Centers**

**FY 2015-2016**

**Child Care Food Program**



# Monitoring Reminders

- ▶ Pre-approval Visits must be conducted at each center prior to program participation.
- ▶ A minimum of 3 unannounced reviews per center must be conducted annually unless Review Averaging is used.
  - ▶ See Oversight Workbook for prorating reviews of centers operating less than 9 months during the year.
  - ▶ No more than 6 months may elapse between reviews, even if the reviews occur in different fiscal years!
- ▶ New centers must be reviewed within the first 4 weeks of operation.
  - ▶ This counts as one of the three required reviews.
- ▶ Reviews must include a variety of meal types
  - ▶ This includes weekends, evenings, and holidays ~ if applicable.
- ▶ Reviews must be conducted in an unpredictable manner!



# Monitoring Reminders (cont'd)

- ▶ Reviews that have disallowances or significant findings must have a CAP and Follow-up Review conducted
- ▶ If a center fails the 5-Day Test on two consecutive reviews (including follow-up reviews), the sponsor must conduct “household contacts.”
- ▶ Sponsor monitor must leave a signed copy of the completed review with the center representative.
- ▶ Completed review form must receive a second party check by the CCFP Program Manager to ensure completeness and accuracy!!



# Compliance “Toolbox”



- ▶ Disallowances
- ▶ Milk Test and Receipts (at monthly claim review)
- ▶ Corrective Action Plans (CAPs)
- ▶ Follow-up Reviews
- ▶ Required Attendance at Sponsor Trainings and on-line modules
- ▶ Visitation Reports
- ▶ Household Contacts
- ▶ Sister Agency's Records (ELC, DCF, VPK, etc.)
- ▶ Warning Letters
- ▶ Termination at Will
- ▶ DOH Support!!

# Milk Usage Test~

## Clarification of Disallowances

- ▶ Required once per year for self-prep centers or catered centers that purchase milk separately from the catered meals. (Page 31 of Oversight Workbook).
- ▶ Required more frequently for centers that fail.
  - ▶ A CAP and Follow-up are also required for centers that fail.
- ▶ When calculating milk disallowances, sponsor must consider other meal disallowances for that month.
  - ▶ Don't "double disallow"
  - ▶ Determine which disallowance is larger (the milk disallowance or menu disallowance), and apply the larger disallowance
  - ▶ **Example:** If Menu disallowances result in a deduction of 100 B, 100 L, and 100 PM while Milk Test disallowances result in a deduction of 50 B, 50 L, and 50 PM, sponsor would use the Menu disallowance totals of 100 B, L, and PM. Sponsor WOULD NOT deduct 150 B, L, and PM.
  - ▶ Document your method for second party review and/or DOH review



**“An Ounce of Prevention is Worth a  
Pound of Cure” ~Benjamin Franklin**



# Preventative Maintenance

- ▶ Good Tracking Logs
  - ▶ Sample Site Review Tracking Log on page 28 of Oversight Workbook
- ▶ Internal Quality Assurance Procedures
  - ▶ Second Party Checks (required)
  - ▶ Peer Reviews
  - ▶ Program Manager Conducts On-Site Reviews
- ▶ Training
  - ▶ Sponsor Staff and Center Staff
- ▶ Sponsor Sharing/Networking
- ▶ DOH Tools
  - ▶ Forms, Manuals, Handbooks, Policy Memos, Website, Training Modules, etc.
- ▶ DOH Support
  - ▶ Utilize Tallahassee Staff
  - ▶ Ask Questions





# New DOH Initiative

- ▶ With our continued emphasis on quality and program integrity, DOH will be implementing some unannounced facility reviews without the sponsor monitor
  - ▶ DOH monitors will conduct a minimum of 25% (or a minimum of 1, whichever is greater) of their required unannounced site reviews without the sponsor monitor.
  - ▶ DOH monitor will expand sample, if necessary.
  - ▶ DOH has already been doing this in some cases (S's and U's), and has found some discrepancies that warrant implementing this integrity measure as a new procedure.
  - ▶ DOH will send a copy of their review to Sponsor Program Manager and will notify Sponsor of any findings.
- ▶ Sponsors must train on this at their annual training this year
  - ▶ Let center staff know that DOH staff will be coming on their own, without the sponsor monitor, to conduct unannounced reviews.
  - ▶ DOH staff will have their ID badges to identify themselves.
  - ▶ This is addressed in the Sponsor-Center Agreement (Section II.J.)



# Any Questions?

